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1 UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF CALIFORNIA

3 Christoper Kohls, Case No. 2:24-cv-02527-JAM-CKD
4 *Plaintiff,*
5 v. **Plaintiffs' Notice of Motion and**
6 Rob Bonta, et al., **Motion for Summary Judgment**
7 *Defendants.* **against AB 2839**
8 **Date:** August 5, 2025
9 **Time:** 1:00 pm
Crtrm: 6, 14th floor
Judge: John A. Mendez

10 The Babylon Bee, LLC, et al. Case No. 2:24-cv-02787-JAM-CKD
11 *Plaintiffs,*
12 v.
13 Rob Bonta, et al.,
14 *Defendants.*

15 Rumble Inc., et al. Case No. 2:24-cv-03315-JAM-CKD
16 *Plaintiffs,*
17 v.
18 Rob Bonta, et al.
19 *Defendants.*

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21 X Corp, Case No. 2:24-cv-03162-JAM-CKD
22 *Plaintiff,*
23 v.
24 Rob Bonta, et al.
25 *Defendants.*
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**PLAINTIFFS' NOTICE OF MOTION AND
MOTION FOR SUMMARY JUDGMENT AGAINST AB 2839**

Plaintiffs Christopher Kohls, The Babylon Bee, LLC, and Kelly Chang

Rickert move for summary judgment under Federal Rule of Civil Procedure 56 and Local Rule 260. Plaintiffs request that this Court enter a permanent injunction prohibiting Defendants from enforcing AB 2839, Cal. Elec. Code § 20012 *et seq.*, facially and as applied. Under 28 U.S.C. § 2201, Plaintiffs also seek declaratory relief stating that facially and as applied AB 2839 violates the First and Fourteenth Amendments to the United States Constitution and Article I, Section 2, of the California Constitution.

As set out in Plaintiffs' attached memorandum of law, there is no genuine dispute of any material fact that would preclude summary judgment, and Plaintiffs are entitled to judgment as a matter of law. In support of this motion, Plaintiffs submit and rely upon the following:

- Memorandum of Law in Support of Plaintiffs' Motion for Summary Judgment against AB 2839
- Statement of Undisputed Facts in Support of Plaintiffs' Motions for Summary Judgment
- Declaration of Christopher Kohls in Support of Plaintiffs' Motions for Summary Judgment
- Declaration of Seth Dillon in Support of Plaintiffs' Motions for Summary Judgment
- Declaration of Kelly Chang Rickert in Support of Plaintiffs' Motions for Summary Judgment
- Declaration of Joel Kurtzberg in Support of Plaintiffs' Motions for Summary Judgment
- All documents previously filed with the Court

Should this Court grant Plaintiffs' request for relief, Plaintiffs also seek reasonable attorneys' fees and costs, and any other relief this Court finds just and proper.

DATED: March 7, 2025

s/ Adam E. Schulman

Adam E. Schulman

(authorized 03.07.2025)

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PROOF OF SERVICE

I hereby certify that I filed a true and accurate copy of the foregoing document with the Clerk of Court using the CM/ECF system, which automatically sends an electronic notification to all counsel of record.

DATED this 7th day of March, 2025.

s/ Johannes Widmalm-Delphonse
Johannes Widmalm-Delphonse
Counsel for Plaintiffs The Babylon
Bee, LLC and Kelly Chang Rickert